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Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**
Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

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Bankruptcy Case
No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ROBERT A.
JULIAN IN SUPPORT OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' MOTION FOR ORDER
DIRECTING SUPPLEMENTAL
DISCLOSURE IN THE FORM OF A
LETTER FROM THE TCC**

[Related Dkt. Nos. 6340, 6353, 6448, 6483]

1 I, Robert A. Julian, hereby declare:

2 1. I am a member in good standing of the bar of California and I am admitted to practice
3 in the United States Bankruptcy Court in the Northern District of California. I am a partner at
4 Baker Hostetler LLP, attorneys of record for The Official Committee of Tort Claimants (the
5 “TCC”). I have personal knowledge of the facts stated herein and I could and would competently
6 and truthfully testify to those facts if called as witness.

7 2. This Declaration is submitted in support of the TCC’s motion (“**Motion**”) for entry
8 of an order directing supplemental disclosure in the form of a letter from the TCC, filed
9 contemporaneously herewith. Any words capitalized herein but not defined herein have the
10 meaning attributed to them in the Motion.

11 3. A copy of the transcript from the hearing held by this Court on March 25, 2020 is
12 attached hereto as **Exhibit A**.

13 4. As discussed on the record at the March 25 hearing, the TCC has been involved in
14 mediation on a number of disputes with the Debtor and the Shareholder Plan Proponents regarding
15 the RSA and the current Plan. The mediation has been ongoing for several weeks, and included
16 the subject matter of the TCC’s Proposed Letter to victims, including but not limited to the
17 following three issues that I discussed on the record on March 25: the lack of a registration rights
18 agreement, the potential devaluation of the \$6.75 billion of stock promised to the Fire Victim Trust,
19 and the uncertainty whether the Fire Victim Trust will be funded with stock and cash before August
20 29, 2020, in accordance with the TCC RSA.

21 5. On March 27, 2020, counsel for the Debtors and the Shareholder Plan Proponents
22 and counsel for the TCC and TCC representatives met for the last time to discuss mediation issues.
23 The parties are now at an impasse on the issues and disputes.

24 6. Now that the mediation is at an impasse, the TCC can advise the victims of the
25 TCC’s the major issues with the Debtors’ Plan.

26 7. Accordingly, the TCC believes that it needs to express its views publicly on the Plan
27 and provide the Fire Victim Claimants with the information provided in the Proposed Letter.
28

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on the 3rd day of April, 2020.

By: /s/ Robert A. Julian
Robert A. Julian